UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: KEITH THOMAS HENCH and : CHAPTER 13

JESSE LEE HENCH

Debtors

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JACK N. ZAHAROPOULOS

STANDING CHAPTER 13 TRUSTEE

Movant

:

VS.

:

KEITH THOMAS HENCH and

JESSE LEE HENCH

Respondents : CASE NO. 1-23-bk-01246

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 6th day of July, 2023, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan forthe following reason(s):

- 1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
 - a. Insufficient Monthly Net Income as indicated on Schedules I and J.
 - b. The plan is underfunded relative to claims to be paid.
- 2. Trustee avers that debtor(s)' plan cannot be administered due to the lack of the following:
 - a. Last paystub for wife (debtor 2).

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

a. Deny confirmation of debtor(s) plan.

- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036 (717) 566-6097

BY: /s/Douglas R. Roeder
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 12th day of July, 2023, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Nicholas Platt, Esquire 230 York Street Hanover, PA 17331

/s/Deborah A. DePalma
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee4